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Court-Appointed Lead Counsel

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE TEZOS SECURITIES LITIGATION

This document relates to:

ALL ACTIONS.

Master File No. 17-cv-06779-RS

CLASS ACTION

**DECLARATION OF HUNG G. TA IN
SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION FOR
LEAVE TO FILE A RESPONSE TO THE
DECLARATIONS OF ARTHUR
BREITMAN AND KATHLEEN
BREITMAN CONCERNING ASSERTION
OF MARITAL COMMUNICATIONS
PRIVILEGE**

Judge: Hon. Sallie Kim

1 I, HUNG G. TA, declare under penalty of perjury as follows:

2 1. I am the principal of the law firm Hung G. Ta, Esq. PLLC (“HGT Law”), court-
3 appointed co-lead counsel in this matter. I am an active member in good standing of the bar of the
4 State of New York and have been admitted *pro hac vice* in this matter. I submit this declaration in
5 support of Plaintiffs’ Administrative Motion for Leave to File a Response to the Declarations of
6 Arthur Breitman and Kathleen Breitman Concerning Assertion of Marital Communications Privilege
7 (“Administrative Motion”).

8 2. Plaintiffs could not obtain a stipulation concerning the subject matter of the
9 Administrative Motion because the Court’s order on discovery permitting the Breitmans to submit
10 declarations in support of their assertion of the marital communications privilege (Dkt. No. 232) does
11 not afford Plaintiffs an opportunity to respond. I am not aware of any other rule or statute that
12 otherwise permits a response.

13 I declare under penalty of perjury that the foregoing is true and correct, this 25th day of July,
14 2019.

15
16 /s/ Hung G. Ta

17 Hung G. Ta

18
19 **FILER’S ATTESTATION**

20 Pursuant to Civil L.R. 5-1(i)(3), regarding signatures, Enoch H. Liang hereby attests that
21 concurrence in the filing of the documents has been obtained from the signatories above.

22
23 Date: July 25, 2019

24 By: /s/ Enoch H. Liang

25 Enoch H. Liang
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